

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>CICELY JAMES, and</b>	§	<b>CIVIL ACTION NO. 4:15-cv-02745</b>
<b>KEN RICE,</b>	§	
<b>Individually and on Behalf of All Others</b>	§	
<b>Similarly Situated,</b>	§	
	§	
<b>Plaintiffs,</b>	§	
	§	
<b>VS.</b>	§	<b>COLLECTIVE ACTION</b>
	§	
<b>PRIME CONSULTING GROUP, INC.,</b>	§	
<b>KEITH BRUCE,</b>	§	
<b>CHIHUAHTHA COMPTON, and</b>	§	
<b>VICTOR GREEN,</b>	§	
	§	
<b>Defendants.</b>	§	<b>JURY TRIAL DEMANDED</b>

**JOINT MOTION TO APPROVE CONFIDENTIAL SETTLEMENT  
AND FOR DISMISSAL WITH PREJUDICE FOLLOWING FINAL REPORT  
(FILED PARTIALLY UNDER SEAL)**

Plaintiffs Cicely James, Ken Rice, Jacqueline Griffin, Laura Gaona, Barbara Anderson, Torrey Hicks, Timothy Craig Tetley, G. Elyn Okumura, Bruce Jones, Marjorie Castro, Romona Adams, Lucas Cabrera, Sybil Shumate, Gena Anders, Donald Anders, and Amber Kuhn (“Plaintiffs”), and Defendants Prime Consulting Group, Inc., Keith Bruce, Chihuahtha Compton, and Victor Green (“Defendants”) (Plaintiffs and Defendants are collectively the “Parties”), by and through their respective counsel, jointly move this Court for approval of the Parties’ settlement of this FLSA matter and dismissal with prejudice following final report. The Parties’ fully-executed confidential settlement (consisting of sixteen “Confidential Settlement Agreement and Release” documents; one

for each Plaintiff) is being submitted to the Court *under seal* as **Exhibit A**. The Parties believe this settlement is fair and reasonable under all of the facts and circumstances.<sup>1</sup>

Should the Court require additional briefing/information about Plaintiffs' attorneys' fees and costs as provided in the settlement, Plaintiffs' counsel will do so immediately upon request.

The Parties also request that the Court dismiss this action with prejudice, each party to bear its own fees and costs except as provided in the Confidential Settlement Agreements, upon receipt of a Final Report from the Parties indicating that all settlement payments have been made.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion approving the Parties' confidential settlement agreement as prayed for herein and set forth in the accompanying proposed Order.

Dated: August 26, 2016

**RESPECTFULLY SUBMITTED,**

/s/ Michael A. Starzyk

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<sup>1</sup> Should the Court require additional briefing/information about Plaintiffs' attorneys fees and costs as provided in the settlement, Plaintiffs' counsel will do so immediately upon request

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of August, 2016, I served the foregoing on the following in accordance with the Federal Rules of Civil Procedure:

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